

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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IN RE: NATIONAL FOOTBALL LEAGUE  
PLAYERS' CONCUSSION INJURY  
LITIGATION

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Kevin Turner and Shawn Wooden,  
*on behalf of themselves and others  
similarly situated,*

Plaintiffs,  
v.

National Football League, et al.,

Defendants.

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THIS DOCUMENT RELATES TO:  
ALL ACTIONS

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)  
) MDL No. 2323

)  
) No. 18-md-02323-AB

)  
) **Hon. Anita B. Brody**

)  
) Civ. Action No. 14-00029-AB

**DECLARATION OF THOMAS V. GIRARDI IN RESPONSE TO COURT'S  
REQUEST FOR DOCUMENTATION RE THIRD PARTY ASSIGNMENTS**

1. I, Thomas V. Girardi, am an attorney at law duly authorized to practice before all the courts of this state, and am a member of the law firm of Girardi|Keese, attorneys of record for Plaintiffs here. I have personal knowledge of the facts as set forth herein and could testify competently thereto if called upon as a witness. I make this Declaration in response to the Court Order dated March 28, 2018, ECF 9833.

2. Girardi Keese registered one hundred and thirty-five former NFL players in the Concussion Settlement.
3. Of those one hundred and thirty-five former NFL players Girardi and Keese presently represents one hundred and fourteen former NFL players in the Concussion Litigation.
4. One of Girardi and Keese's clients has received a monetary award. Four clients have been informed they are entitled to receive a monetary award.
5. Eighty-one of Girardi Keese's clients have submitted claims packages.
6. Of the one hundred and fourteen class members presently represented by Girardi and Keese, four have entered into to third party assignments.
7. The assignments are with the following companies: Global Financial, Creative Financing Solutions, and Park Settlement NFL Fund. The agreement with Creative Financing Solutions was handled by another law firm that previously represented the former NFL player.
8. The class members who entered into third party assignments have not yet received a monetary award or a notice of a monetary award.
9. Girardi and Keese, or prior counsel, has signed acknowledgements indicating the understanding that the third party lender will be paid from the proceeds of the settlement.
10. Girardi and Keese had no role in creating, promoting or facilitating the assignment. Girardi and Keese simply signed the acknowledgement as required for the client to receive the third party advance.
11. Girardi and Keese has no direct or indirect association with any of the third party litigation funders used by settlement class members represented by Girardi Keese.
12. In accordance with ECF 9517 Girardi and Keese has complied and provided all information to the third party claims administrator.

13. Attached hereto as **Exhibit "1"** are true and correct copies of all of the responsive documents in Girardi and Keese's possession.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 1<sup>st</sup> day of May 2018 in Los Angeles, California.

/s/ Thomas V. Girardi

Thomas V. Girardi

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**CERTIFICATE OF SERVICE**

I hereby certify that I have, this day, electronically filed the foregoing with the Clerk of the Court using CM/ECF system which will send notification of such filing to all counsel of record on this 1st day of May 2018.

/s/ Thomas V. Girardi  
Thomas V. Girardi